

FILED

Plaintiff's Name JARED MARTIN  
Inmate No. 1194594  
Address MADEIRA COUNTY JAIL  
145 TOZER STREET  
MADEIRA, CA 93638

JUL 20 2022

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY [Signature]  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

JARED ANDREW MARTIN

(Name of Plaintiff)

1:22-LV-00002

(Case Number)

vs.

D. CASTILLO

CHRISTIAN REIFFER

KATHLEEN ALLISON

COUNTY OF KERN

CITY OF DELANO

(Names of all Defendants)

AMENDED CIVIL RIGHTS COMPLAINT UNDER:

☒ 42 U.S.C. 1983 (State Prisoner)

☐ Bivens Action [403 U.S. 388 (1971)] (Federal Prisoner)

RECEIVED

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EASTERN DISTRICT OF CALIFORNIA  
BY [Signature]  
DEPUTY CLERK

I. Previous Lawsuits (list all other previous or pending lawsuits on additional page):

A. Have you brought any other lawsuits while a prisoner? Yes    No   

B. If your answer to A is yes, how many? 6

Describe previous or pending lawsuits in the space below. (If more than one, attach additional page to continue outlining all lawsuits in same format.)

1. Parties to this previous lawsuit:

Plaintiff

JARED MARTIN

Defendants

OFFICER NORTHCLIFF ET AL,

CHRISTIAN REIFFER

2. Court (if Federal Court, give name of District; if State Court, give name of County)

EASTERN DISTRICT

3. Docket Number

1:22-LV-00748

4. Assigned Judge

5. Disposition (Was the case dismissed? Appealed? Is it still pending?)

PENDING

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6. Filing Date (approx.) \_\_\_\_\_

7. Disposition Date (approx.) \_\_\_\_\_

**II. Exhaustion of Administrative Remedies**

**NOTICE:** Pursuant to the Prison Litigation Reform Act of 1995, "[n]o action shall be brought with respect to prison conditions under [42 U.S.C. § 1983], or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." 42 U.S.C. § 1997e(a). Prior to filing suit, inmates are required to exhaust the available administrative remedy process, *Jones v. Bock*, 549 U.S. 199, 211, 127 S.Ct. 910, 918-19 (2007); *McKinney v. Carey*, 311 F.3d 1198, 1999 (9th Cir. 2002), and neither futility nor the unavailability of money damages will excuse the failure to exhaust, *Porter v. Nussle*, 534 U.S. 516, 524, 122 S.Ct. 983, 988 (2002). If the court determines that an inmate failed to exhaust prior to filing suit, the unexhausted claims will be dismissed, without prejudice. *Jones*, 549 U.S. at 223-24, 127 S.Ct. at 925-26.

A. Is there an inmate appeal or administrative remedy process available at your institution?

Yes        No       

B. Have you filed an appeal or grievance concerning ALL of the facts contained in this complaint?

Yes        No       

C. Is the process completed?

Yes       

If your answer is yes, briefly explain what happened at each level.

I HAD GRIEVANCES APPROVED AND GRANTED FROM THE PRISON AND LODG IN SACRAMENTO. MOST OF EVERY INSTANCE THERE WERE LIES AND ATTEMPTED COVER UP BY CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION EMPLOYEES.

No       

If your answer is no, explain why not.

**III. Defendants**

List each defendant's full name, official position, and place of employment and address in the spaces below. If you need additional space please provide the same information for any additional defendants on separate sheet of paper.

A. Name D. CASTILLO is employed as CORRECTIONAL OFFICER

Current Address/Place of Employment KERN VALLEY STATE PRISON

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B. Name CHRISTIAN REIFFER is employed as WARDEN

Current Address/Place of Employment KERN VALLEY STATE PRISON

C. Name KATHLEEN ALLISON is employed as SECRETARY OF THE COLR

Current Address/Place of Employment \_\_\_\_\_

D. Name COUNTY OF KERN is employed as \_\_\_\_\_

Current Address/Place of Employment \_\_\_\_\_

E. Name CITY OF DELANO is employed as \_\_\_\_\_

Current Address/Place of Employment \_\_\_\_\_

**IV. Causes of Action** (You may attach additional pages alleging other causes of action and the facts supporting them if necessary. Must be in same format outlined below.)

**Claim 1:** The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.):

12TH, 4TH, 5TH, 6TH, 8TH AND 14TH AMENDMENTS UNITED  
STATE CONSTITUTION, EXCESSIVE FORCE, SEXUAL ASSAULT  
HARASSING LEFT LESBES, SUPERVISOR LIABILITY

**Supporting Facts** (Include all facts you consider important to Claim 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

I HAVE OVER A DOZEN WITNESSES WHO HAVE COME  
FORWARD AND SAID EXACTLY AS I HAVE SAID.  
THE EXCESSIVE FORCE HAPPENED MORE THAN ONCE, OFFICER  
CARTILLO SEXUALLY FELT ON ME MORE THAN ONCE, CARTILLO  
RAIDED MY LEFT FOR NO REASON OTHER THAN  
TO HARASS ME AND STEAL FROM ME MORE  
THAN ONCE. OFFICER CARTILLO INTERFERED IN MY

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MEDICAL CARE DOZEN OF TIMES. I HAVE WITNESSES WHO HAVE COME FORWARD AT THE PRISON AND WILL COME FORWARD AT TRIAL, WARDEN CHRISTIAN PFEIFFER KNEW BECAUSE I TOLD HIM TO HIT HIS FACE AND WROTE HIM LETTERS. I ALSO WROTE KATHLEEN ALLISON SEVERAL TIMES AND RECEIVED COMMUNICATIONS FROM HER OFFICE SAYING ENOUGH THE REMEDIES AND SUE. SHE KNEW AND KNOWS ALL ABOUT THESE ISSUES. YES, THE CITY OF DELANO AND THE COUNTY OF KERN POLICES HAVE ALLOWED CORRECTIONAL OFFICER D. CASTILLO TO BULLY ME. NOT STEPPING IN, NOT STEPPING UP, MAKE THEM RESPONSIBLE.

**Claim 2:** The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.):

1ST, 4TH, 5TH, 6TH, 8TH AND 14TH AMENDMENTS U.S. CONSTITUTION. DELIBERATE INDIFFERENCE TO MEDICAL NEED, CITY OF DELANO, COUNTY OF KERN AS DEFENDENTS

**Supporting Facts** (Include all facts you consider important to Claim 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

THOSE IN AUTHORITY THE WARDEN, THE SECRETARY OF COR, THE CITY OF DELANO AND THE COUNTY OF KERN COULD HAVE STOPPED OFFICER CASTILLO AT ANY TIME AND REFUSED TO. JUST LIKE JUDGE MAGISTRATE BOONE CONTINUED TO MAKE EXCUSES. FIRST MAGISTRATE BOONE TELL ME I SAID TOO MUCH ABOUT THE ABUSE AND THEN TELLS ME I WROTE TOO LITTLE. OVER A DOZEN WITNESSES HAVE SAID THEY SAW CASTILLO FEEL ON ME SEXUALLY, DENY AND INTERFERE WITH MY MEDICAL TREATMENT, HARASS ME AND STEAL FROM ME AND PHYSICALLY ATTACK ME. ALL OF

THESE THINGS WERE DONE TO ME BY CORRELATION  
 OFFICER CASTILLO BECAUSE HE WANTED TO. I DID  
 NOTHING TO DESERVE TO BE TREATED LIKE THAT.  
 HE DID IT BECAUSE HE IS A MURDERER. HE DID IT  
 BECAUSE PEIFFER, ALLISON, THE CITY OF DELANO AND  
 THE COUNTY OF KERN LET HIM DO IT. HE TORTURED  
 ME BECAUSE JUDGE MAGISTRATE BOONE AND THOSE IN  
 POWER MAKE EXCUSES AND ACT LIKE IT DIDN'T HAPPEN.  
 I HAVE WENT INTO GREAT DETAIL, MANY TIMES, IT'S A COVERUP.


#### V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I WANT A JURY TRIAL, I WANT 100 million DOLLARS  
 IN DAMAGES. JUDGE BOONE CONTINUED TO HAVE ME TELL  
 HIM THE SAME THING, ONLY HE GIVES ME LESS PAGES TO  
 DO IT WITH. YOU CANNOT GIVE MORE DETAIL WITH LESS  
 PAGES. JUDGE BOONE HAS EVIDENCE CASTILLO DID THESE THINGS  
 TO ME. I HAVE WITNESSES AND EVIDENCE, TIME FOR TRIAL

I declare under penalty of perjury that the foregoing is true and correct.

Date: 7-14-2022

Signature of Plaintiff: 

(Revised 4/4/14)

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FROM THE MOMENT I RECEIVED MY FIRST COMMUNICATION FROM JUDGE MAGISTRATE BOONE, IT WAS OBVIOUS HE WOULD MAKE EVERY ATTEMPT TO TRY TO DESTROY MY CLAIMS. THIS IS PERSONAL. MAGISTRATE BOONE HAS BEEN TOLD BY ME SEVERAL TIMES IN SEVERAL DIFFERENT WAYS. I WAS BEATEN, ABUSED, SEXUALLY ASSAULTED BY CORRECTIONAL OFFICERS AND THEY TRIED TO MURDER ME. OFFICER CASTILLO HAS PLAYED AROUND AND WITH MY AN AREA MORE THAN ONCE, PLAYED AROUND MY PRIVATE FRONT PARTS MORE THAN ONCE, TRIED TO MAKE ME TAKE MY CLOTHES OFF AND GET NAKED MORE THAN ONCE. THESE WERE NOT SEARCHES, IT WAS TO GET NASTY WITH ME, FOR SEXUALLY PLEASURING HIMSELF. TWISTING MY ARMS AND FLAMMING ME AROUND AND MAKING ME FALL AND PUTTING HANDCUFFS ON ME FOR NO REASON HAPPENED ALL THE TIME BY CASTILLO. HE DID THESE THINGS BECAUSE HE WANTED TO, BECAUSE HE HAD THE POWER. THROWING MY POLLS IN THE TRASH, NOT LETTING ME GET MEDICAL TREATMENT AND JUST STRAIGHT JUMPING UP IN MY FACE AND THREATENING VIOLENCE TO KEEP ME FROM GETTING HEALTHCARE HAPPENED ALL THE TIME. I AM TIRED OF JUDGE MAGISTRATE BOONE AND HIS LYING. HE HAS BEEN TOLD TOO MANY TIMES IN TOO MANY DIFFERENT WAYS, CASTILLO TORTURED ME. THE BOTTOM LINE IS THIS, JUDGE BOONE DOES NOT CARE WHAT A DITTY COR DOES TO WHAT INMATE, I HAVE WITNESSES AND EVIDENCE, IF BOONE WANTS TO KEEP ACTING LIKE CASTILLO WANTS ABUSING INDIGENT INMATES ON THEM, I AINT GOING TO KEEP ASKING BOONE TO DO RIGHT, IT'S CLEAR HE WILL NOT.

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